



ASSOCIATION OF

# FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D.C.

September 19, 2000

DOCKET FILE COPY ORIGINAL

Magalie Roman Salas, Secretary  
Office of the Secretary, TW-A325  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: *Docket*  
DA 00-10

INITIAL FILING DATE FOR MORE INCLUSIVE MINOR CHANGE APPLICATIONS  
FOR CLASS A, LPTV, AND TV TRANSLOCATORS

Dear Ms. Salas,

Transmitted herewith for filing with the FCC are the original and four copies of comments in the above-referenced matter. Also enclosed is an additional "return copy" for our records and a stamped, addressed envelope.

If any questions arise in this matter, please contact the undersigned.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joe Davis", written over a horizontal line.

Joseph M. Davis  
AFCCE President

c/o Cavell, Mertz & Davis, Inc.  
10300 Eaton Place, Suite 200  
Fairfax, VA 22030  
703-591-0110

cc: Keith Larson, FCC MMB  
Hossein Hashemzadeh, FCC MMB

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## Initial Filing Date for More Inclusive Minor Change Applications for Class A, LPTV and TV Translators

MM Docket  
No. 00-10

The Association of Federal Communications Consulting Engineers (AFCCE), which recently celebrated its 50 year anniversary, is an organization that includes approximately 90 full members who are Registered Professional Engineers engaged in the practice of consulting engineering before the Federal Communications Commission. Many of the Association's members provide engineering services to clients who are licensees of Class A, LPTV and TV translators.

AFCCE is requesting postponement of the October 1, 2000 initial filing date for Class A, LPTV and TV Translator minor change applications pursuant to the more inclusive minor change definition adopted in the Commission's Report and Order under MM Docket No. 00-10, Establishment of a Class A Television Service, adopted March 28, 2000 and

released April 4, 2000.<sup>1</sup> The October 1 deadline was appropriate at the time the Commission adopted the Report and Order.

On May 1, 2000 the Mass Media Bureau and the Wireless Telecommunications Bureau announced a July 31 limited auction filing window for certain low power television, television translator, and Class A television broadcast stations. The window was to begin on July 31, 2000 and end on August 4, 2000.<sup>2</sup> Based on a Petition for Reconsideration, the Commission extended the deadline for the submission of the portions of FCC Forms 301-CA or 346 from August 4, 2000 to August 31, 2000.<sup>3</sup>

Moreover, it is our understanding that the Commission has received a much larger number of such major change applications as the result of this limited auction window than they anticipated at the time the Report and Order was adopted. Upwards of 4,000 such applications have been mentioned in informal conversations with Commission staff members.

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<sup>1</sup> See paragraph 112. The October 1, 2000 initial filing date for Class A, LPTV and TV Translator minor change applications under the new, more inclusive definition was specified by the Commission in order not to complicate the authorization of initial Class A licenses and displacement relief applications filed as the result of the Report and Order.

<sup>2</sup> See Public Notice DA 00-1383, "Notice and Filing Requirements Regarding July 31 through August 4, 2000 Limited Low Power Television/Television Translator/Class A Television Auction Filing Window," released June 23, 2000.

<sup>3</sup> See Public Notice DA 00-1648, "Limited Low Power Television/Television Translator/Class A Television Auction Filing Window Partially Extended to August 31, 2000," released July 25, 2000.

We believe it is in everyone's best interest that the October 1 initial filing date be postponed until the Commission's staff completes the data entry of these recently filed LPTV auction applications into the Commission's consolidated data base system (CDBS), followed by an additional thirty-day period.

The Commission could not have anticipated the large number of applications or the extension of the filing window closing when it established the October 1, 2000 initial filing date for minor change applications under the more inclusive definition. These applications, for the most part, have not yet been entered into the Commission's data base.<sup>4</sup> These auction applications will undoubtedly affect the permissible allocation of contemplated minor change applications permitted to be filed on and after October 1. If minor change applications are accepted before the data base includes the auction applications, we anticipate that the Commission's processing of these applications will disclose a large number of conflicts, requiring needless further expenditure of Commission Staff resources to resolve.

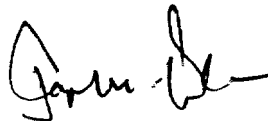
Therefore, AFCCE is seeking the postponement of the October 1, 2000 initial filing date until the Commission completes the data entry of the auction applications plus an additional thirty day period. The additional thirty day period, to begin after all the auction applications have been entered into the CDBS, will provide minor change applicants an

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<sup>4</sup>We believe that the Commission staff will need at least 60 days to enter the new auction applications.

opportunity to assess the impact of the auction applications upon their contemplated minor change applications. The additional thirty day period should prevent the filing of applications which conflict with the auction applications and eliminate a significant amount of staff effort for the Commission as well as inappropriate filings by applicants.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joe Davis", written in a cursive style.

Joseph M. Davis  
President

September 19, 2000

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